IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

United States of America, : Case No. 3:18-CR-00168-2

Plaintiff, : HON. JEFFREY J. HELMICK

vs. : MOTION FOR EXTENSION OF

TIME TO SUBMIT OBJECTIONS TO

Barbara Wilson, et al., : PRESENTENCE INVESTIGATION

REPORT

Defendants. :

Defendant Barbara Wilson respectfully moves the Court for a 30-day extension of time within which to submit her Objections to her Presentence Investigation Report (Doc. No. 57).

Ms. Wilson's Objections to the first disclosure of her PSR are currently due July 8, 2019. Although Ms. Wilson is on pretrial release, she currently lives in Houston, Texas, which has made collaboration with counsel difficult. Further, with the intervening July 4 holiday and the press of other business, counsel and client require further time to confer.

Ms. Wilson does not currently have a sentencing hearing on the books. It is anticipated she will be sentenced some time after the trial of her co-defendants, which is currently scheduled for August 13, 2019. The requested extension thus will not prejudice either the parties or the Court, nor will it impact any other Court deadline, including the presentence-report-related deadlines imposed by FED. R. CRIM. P. 32 or 18 U.S.C. § 3552. Accordingly, Ms. Wilson respectfully requests a 30-day extension of time within which to submit her Objections to her Presentence Investigation Report.

Respectfully submitted,

EASTMAN & SMITH LTD.

Motion Granted. So Ordered.

s/ Jeffrey J. HelmickUnited States District Judge

/s/ Adam S. Nightingale Adam S. Nightingale (0079095)

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PROOF OF SERVICE

This is to certify that a copy of the foregoing has been filed electronically this 3rd day of July 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system, and the parties may access this filing through the Court's system.

/s/ Adam S. Nightingale

Attorney for Defendant Barbara Wilson